

DEFENDANT TIMOTHY MONTGOMERY'S SUGGESTED VOIR DIRE QUESTIONS

1. One of the defendants in this case is Timothy Montgomery. Mr. Montgomery is a world class sprinter, former holder of the world record in the 100 meter dash, and gold medalist for the Olympics. Do any of you know or have you heard of Timothy Montgomery? Would that affect your ability to be impartial at the trial of this matter? Would Mr. Montgomery's accomplishments and celebrity cause any of you to treat him differently or affect your ability to be impartial?

2. Have any of you ever heard anything on television or radio, or seen anything in the newspapers, regarding Timothy Montgomery and this case? Would that affect your ability to be impartial at the trial of this matter?

3. The persons expected to testify are: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_ Do

any of you or a member of your immediate family know or have any professional or social relationships with any of the expected witnesses?

4. Have any of you or a member of your family ever been employed by or had any significant involvement with the United States Government? Would that past experience affect your ability to be impartial at the trial of this matter?

5. Have you, or has any member of your immediate family, ever been involved as a party or appeared as a witness in any court proceeding (civil or criminal) or in any investigation by a federal or state authority or by an official legislative body or agency?  
Would that prior experience affect your ability to be impartial at the trial of this matter?

6. Have any of you ever served on a grand jury? Have any of you ever served on a trial jury; criminal or civil; what was the outcome of the case? Would that past experience affect your ability to be impartial at the trial of this matter?

7. Have you, or has any member of your immediate family, ever been employed by or received training from any local, state or federal law enforcement agency? Would that affect your ability to be impartial at the trial of this matter?

8. Do you have any experiences or feelings concerning government or law enforcement agencies generally that would cause you to be prejudiced either in favor of or against the Government in a criminal prosecution?

9. The law is that the testimony of government agents and employees is to be given no lesser or greater weight than the testimony of any other witness. Would you have any difficulty in accepting this proposition of law?

10. The jury will be instructed that the defendant charged in this case is presumed to be innocent throughout the trial, and that no defendant can be found guilty of any offense until the Government has proved each element of that offense beyond a reasonable doubt. Would you have any difficulty with accepting this proposition of law?

11. Under our laws, each defendant has the right to decide whether he or she will testify. If a defendant elects not to testify, the law is that a jury may not draw an inference of guilt against a defendant because of his or her decision not to testify. Would you have any difficulty with accepting this proposition of law?

12. Three of the defendants in this case, Messieurs Alexander, Riddick, and Montgomery, live in the Norfolk, Virginia area and may often be referred to as the "Virginia defendants." Overall, their alleged involvement in the activities charged in this case is different

and more limited than the activities alleged against the other group of defendants, who will often be referred to as the “New York defendants.” Each defendant is entitled to a fair trial and a separate consideration of the evidence against him. Do any of you have any beliefs or experiences that will limit or prevent you from distinguishing the evidence and charges against the New York defendants from those alleged against the Virginia defendants?

13. As I mentioned, Mr. Montgomery is a former Olympic gold medalist. Do any of you, or a member of your family, have any connections with the Olympics, or do you have any strong beliefs about the Olympics? Would your experience or your beliefs affect your ability to be impartial in this matter?